

EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
PURDUE PHARMA L.P., <i>et al.</i> , ¹)	
)	Case No. 19-23649 (RDD)
Debtors.)	
)	(Jointly Administered)

**THE AD HOC GROUP OF NON-CONSENTING STATES'
DISCOVERY REQUESTS TO [_____]**

Pursuant to Rules 26, 34, and 45 of the Federal Rules of Civil Procedure (the “Federal Rules”), as made applicable herein by Rules 7026, 7034 and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), as well as Bankruptcy Rules 2004 and 9016, and Rule 7026-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”), and the Order of this Court dated May __ 2020 [Docket No. ____] (the “2004 Order”), the Ad Hoc Group of Non-Consenting States (the “Non-Consenting

¹ The debtors in these chapter 11 cases (“Debtors” or “Purdue”), along with the last four digits of their federal tax identification numbers, are Purdue Pharma Manufacturing L.P. (3821), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies K.P. (1868), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (6166), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ principal offices are at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

States”)² by and through its undersigned counsel, hereby requests that “You” (as defined below) prepare and serve answers, separately and fully, in writing and under oath, to these discovery requests and produce on a rolling basis the “Documents” (as defined below) and things requested herein for inspection and copying at the offices of Pillsbury Winthrop Shaw Pittman LLP at 31 West 52nd Street, New York, New York 10019 by May __, 2020.

DEFINITIONS

Pursuant to Local Rule 7026-1, Local Civil Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the “Local Civil Rules”) applies to discovery requests made in cases under the Bankruptcy Code. Accordingly, the terms “concerning,” document,” and “person” are synonymous with the same terms in Local Civil Rule 26.3 but are set forth below for ease of reference. Additional terms not defined in Local Civil Rule 26.3 or elsewhere in this document but used in this document are ascribed the following meanings:

1. “**Accounts**” means checking, savings, NOW, Time, current, or other deposit or checking accounts; brokerage, investment, trust, or managed accounts; loans or loan accounts, lines of credit, mortgages, in all cases regardless of status, whether open or closed, outstanding or satisfied.

2. “**Concerning**” means relating to, referring to, describing, evidencing or constituting.

3. “**Document(s)**” is defined to be synonymous in meaning and equal in scope to the usage of the term “documents or electronically stored information” in Fed. R. Civ. P. 34(a)(1)(A).

A draft or non-identical copy is a separate document within the meaning of this term.

Federal Rule 34(a)(1)(A) provides “any designated documents or

² California, Colorado, Connecticut, Delaware, the District of Columbia, Hawaii, Idaho, Illinois, Iowa, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Hampshire, New Jersey, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Vermont, Virginia, Washington, and Wisconsin.

electronically stored information—including writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained either directly or, if necessary, after translation by the responding party into a reasonably usable form.”

Fed. R. Civ. P. 34(a)(1)(A).

4. “**Named Person(s)**” means the Persons identified in **Attachment A**.

5. “**Person**” means any natural person or any legal entity, including, without limitation, any business or governmental entity or association.

6. “**Pertaining to**” means, in whole or in part, constituting, Concerning, evidencing, containing, discussing, commenting upon, describing, analyzing, identifying, stating, relating to, referring to, forming the basis of, in preparation of, or contradicting.

7. “**Transfer**” or “**Transferred**” refers to any payment(s) made to You or by You including, but not limited to, any funds, property, or other value conveyed to You by check, wire transfer, debit, or by any other means.

8. “**You**” or “**Your**” refers to [_____] and any of its parents, subsidiaries, affiliates, and any predecessor entities, including, but not limited to, [_____] and any other Persons acting on behalf of the foregoing.

INSTRUCTIONS

1. **Bates Stamping:** Bates-stamp all Documents and native file names with consecutive numbers. Each individual page should be separately stamped.

2. **Diligent Inquiry:** Persons answering these Requests on Your behalf are directed to make a diligent search of all records within Your possession, custody, or control including Your files, electronic mail, smartphones, and computers, and to interview and otherwise make a diligent inquiry of all of Your officers, directors, employees, and agents to identify and produce all information required hereunder.

3. **Forms of Response:** In responding to each Request, set forth the Request in full before providing the response and, if producing Documents, specify the particular Bates range responsive to each individual Request.

4. **Documents Generally:** You are required to produce the originals or legible exact copies of all Documents described in this Request in Your actual or constructive possession, custody, or control. Documents in the possession or custody of Your employees, agents, and contractors are considered to be within Your control. If there are no Documents in Your possession, custody, or control that are responsive to any particular Request, so state in writing.

5. **Claims of Privilege:** Where a claim of privilege is asserted in response to any of the following Requests, or any subpart thereof, and any information is not provided on the basis of such assertion, the following information shall be provided:

- a. the nature of the privilege being claimed;
- b. the Request to which it is responsive;
- c. the nature of information or the subject matter of the Document; and
- d. all other Persons to whom the information or copies of the Document, or any portions thereof, have been disclosed.

6. **Lost, Removed, Destroyed, or Altered Documents:** If any Document responsive to this Request has been lost, removed, destroyed, or altered prior to the service of this Request, produce for each such Document: (1) a description of the Document to the extent known, and the last time and location that the Document is known or believed to have existed; (2) the date, sender, recipient and other Person(s) to whom copies were sent, subject matter, present location, and location of any copies; and (3) the identity of any Person authorizing or participating in any removal, destruction, or alteration of the Document and the method and circumstances of such removal, destruction, or alteration.

7. **Ongoing Duty:** Should You determine that any response to these Requests contains omissions or inaccuracies, You have an ongoing duty to supplement or correct Your response.

8. **Duty to Preserve:** You are required to preserve and maintain any Documents that are related to the subject matter of this Request, regardless of whether You deem them responsive to the Requests herein. You shall instruct Your employees, contractors, and agents to do so and shall take steps to ensure that they fulfill these obligations.

9. **Relevant Time Period:** Unless specified otherwise in Exhibit A for a particular Named Person, the time period relevant to this Request is January 1, 2006 to the present.

10. **Construction of Terms:** Pursuant to Local Civil Rule 26.3(d), the following rules of construction apply:

- a. All/Any/Each. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.
- b. And/Or. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.
- c. Number. The use of the singular form of any word includes the plural and vice versa.

INTERROGATORIES

1. During the Relevant Time Period, list all Accounts You hold or maintain (or held or maintained) Concerning each Named Person, whether held individually or jointly. For each Account listed, include the following information:

- a. Name(s) on the Account
- b. Tax I.D. number for the Persons on the Account
- c. Account Number
- d. Type of Account, *e.g.*, checking, deposit, investment, loan, mortgage, etc.
- e. Status of the Account, *e.g.*, open, closed, outstanding, satisfied, etc.

2. Identify how You communicate with each Named Person, including how, where (*e.g.*, mailing address, email address, etc.), and medium (*e.g.*, electronic mail, physical correspondence). Describe how You maintain communications with the Named Persons, *e.g.*, communications are or are not kept in the Named Person's file or electronic storage repository, communications are or are not stored in the recipient's email account and are or are not copied to another system (and if so, identify the system).

DOCUMENTS TO BE PRODUCED

During the Relevant Time Period, for all Accounts in the name of or for the benefit of any Named Person, regardless of the type of account:

YOU ARE TO PRODUCE:

1. All Documents reflecting or constituting all Accounts Concerning the Named Persons, including, but not limited to:

- a. Signature cards
- b. Corporate board authorization minutes or partnership resolutions
- c. Bank, brokerage, investment, trust, or managed account statements
- d. Canceled checks
- e. Deposit tickets
- f. Items deposited
- g. Credit and debit memos
- h. Form 1099, 1098, or back-up withholding Documents
- i. Loan applications
- j. Loan ledger sheets
- k. Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the means by which loan repayments were made

- l. Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting disbursement of loan proceeds
 - m. Loan correspondence files, including but not limited to:
 - i. Letters to the bank
 - ii. Letters from the bank
 - iii. Notes, memoranda, etc. to the file³
 - n. Collateral agreements and related Documents
 - o. Credit reports
 - p. Financial statements
 - q. Notes or other instruments reflecting the obligation to pay
 - r. Real estate mortgages, chattel mortgages or other security instruments for loans
 - s. Loan amortization statements
2. All Documents sufficient to identify all wire or electronic Transfers sent or received by any of the Named Persons, including but not limited to:
- a. Fed Wire, CHIPS, SWIFT, or other money Transfer or message Documents
 - b. Documents (checks, debit memos, cash in tickets, wires in, etc.) reflecting the source of the funds wired or electronically Transferred out
 - c. Documents (bank checks, credit memos, cash out tickets, wires out, etc.) reflecting the ultimate disposition within the bank of the funds wired in
 - d. Notes, memoranda or other writings Pertaining to the sending or receipt of wire or electronic Transfers
3. All Documents sufficient to identify all current or expired safe deposit box rentals by or under the signatory authority of any of the Named Persons, including but not limited to:
- a. Contracts
 - b. Entry records

³ To the extent that gathering Loan Correspondence requires the application of search terms to any electronically stored information beyond the Name of a Named Person and a loan number, please do not undertake the gathering of responsive documents without first contacting the undersigned as it is not the intent of the requesting party for you to be required to undertake burdensome efforts in response to this request.

4. All CTRs (Forms 4789) and CMIRs (Form 4790) filed with the Department of the Treasury, Internal Revenue Service, or United States Customs and Border Protection by You Concerning currency transactions conducted by or on behalf of the Named Persons.

Dated: May [___], 2020
New York, New York

PILLSBURY WINTHROP SHAW PITTMAN LLP

By: _____
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Counsel to the Ad Hoc Group of Non-Consenting States

Attachment A
Named Persons

Each of the following Persons are “Named Persons” as that term is used in the interrogatory and document requests to which this attachment relates.

- Benjamin J. Shack Sackler (Year of Birth: 1994)
- Beverly Feldman Sackler (Year of Birth: 1924)
- Clare E. Sackler (Year of Birth: 1985)
- David Alex Sackler (Year of Birth: 1980)
- Dylan Weston Sackler Hunt (Year of Birth: 2000)
- Ilene Sackler Lefcourt (Year of Birth: 1946)
- Jacqueline B. Sackler, aka Jacqueline B. Pugh Sackler (Year of Birth: 1976)
- James Edward Frame (Year of Birth: 1974) (**Relevant Time Period: April 2015 – Present**)
- James William Murray Dalrymple, aka Jamie Dalrymple (Year of Birth: 1981)
- Jaseleen A. Ruggles, aka Jaseleen A. Sackler, aka Joss A. Sackler (Year of Birth: 1984) (**Relevant Time Period: February 2009 – Present**)
- Jeffrey M. Lefcourt (Year of Birth: 1972)
- John Francis Weston Hunt (Year of Birth: 1963)
- Jonathan D. Sackler (Year of Birth: 1955)
- Julia H. Shack Sackler, aka Julia H. Shack (Year of Birth: 1996)
- Kathe A. Sackler (Year of Birth: 1948)
- Madeleine C. Sackler (Year of Birth: 1983)
- Marianna Rose Frame, aka Marianna Rose Sackler (Year of Birth: 1983)
- Marissa T. Sackler (Year of Birth: 1980)
- Mary Corson (Year of Birth: 1955)
- Mortimer David Alfons Sackler (Year of Birth: 1971)
- Rebecca Kate Sackler (Year of Birth: 1989)
- Richard Stephen Sackler (Year of Birth: 1945)
- Samantha Sophia Sackler, aka Samantha Sophia Hunt (Year of Birth: 1968)
- Sophia Davina Dalrymple, aka Sophia Davina Sackler (Year of Birth: 1983)

- Susan Amalia Shack Sackler (Year of Birth: 1954) (**Relevant Time Period: September 2009 – Present**)
- Theresa Elizabeth Sackler, aka Dame Theresa Elizabeth Sackler (Year of Birth: 1949)
- Cap 1, LLC, a Delaware limited liability company
- Crystal Fiduciary Company, LLC
- Summer Road LLC, a Delaware limited liability company
- Stillwater Holdings LLC f/k/a Stillwater LLC
- Banela Corporation, a British Virgin Islands company
- Linarite Holdings LLC, a Delaware limited liability company
- Perthlite Holdings LLC, a Delaware limited liability company
- The Purdue Frederick Company Inc., a New York corporation
- The P.F. Laboratories, Inc.
- Rosebay Medical Company L.P., a Delaware limited partnership
- Rosebay Medical Company LLC, a Delaware limited liability company
- Millborne Trust Company Limited
- Data LLC, a Wyoming limited liability company
- Cornice Fiduciary Management LLC, a Wyoming limited liability company
- Pharmaceutical Research Associates L.P. f/k/a Purdue Holdings L.P.
- Moonstone Holdings LLC, a Delaware limited liability company
- Roselite Holdings LLC, a Delaware limited liability company
- PLP Associates Holdings L.P., a Delaware limited partnership
- PLP Associates Holdings Inc., a New York corporation
- BR Holdings Associates Inc., a New York corporation
- BR Holdings Associates L.P., a Delaware limited partnership
- Beacon Company
- Stanhope Gate Corporation
- Rosebay Medical Company, Inc., a Delaware corporation
- MNP Consulting Limited, a Delaware corporation
- Heathridge Trust Company Limited
- Mundipharma Inc., a New York corporation

- Mundipharma LLC, a Delaware limited liability company
- Mundipharma Ltd., a Delaware corporation
- Mundipharma Pharmaceuticals Inc., a New York corporation
- Millsaw Realty L.P., a Delaware limited partnership
- Millsaw Realty Inc., a New York corporation
- Rhodes Technologies Inc., a Delaware corporation
- Hercules Trust
- Trust U/A dated December 23, 1989 fbo the issue of Richard S. Sackler, M.D.
- Trust U/A dated December 23, 1989 fbo the issue of Jonathan D. Sackler
- The Mortimer D. Sackler Foundation Inc.
- Raymond & Beverly Sackler Foundation, Inc.
- Sackler Foundation Inc.
- The Sackler Lefcourt Center for Child Development Inc.
- The Mortimer and Jacqueline Sackler Foundation
- Richard Sackler Family Foundation
- The Shack Sackler Foundation
- Gorey Trust
- La Coupe Trust
- Canadian Partnership Trust
- Beacon Trust
- Clover Trust
- MIL Trust
- Pickering Trust
- Fidinc Trust
- Medichem Trust
- Milton Trust
- Halm Trust
- Tom & Kelly Trust
- Memphis Pharma Trust
- Mundi Lab Trust

- Varus Trust
- Silver Trust
- Mondai Trust
- Angonoka Trust
- Meerkat Trust Lune River Trust
- Jackson River Trust
- PALP Trust
- Cobo Bay Trust
- Diagonal Blue Trust
- Taddeo Trust
- Reserve Trust
- Ilene S. Lefcourt Trust 88
- Ilene S. Lefcourt Trust 96
- ISL 2010 Family Trust
- ISL 2011 Family Trust
- BSS Trust 98
- BJSS 2010 Trust
- BJSS 2013 Trust
- JSS Trust 98
- JHSS 2010 Trust
- JHSS 2013 Trust
- Kathe A. Sackler Trust 88
- Kathe A. Sackler Trust 96
- Kathe A. Sackler 2001 Trust
- KAS 2010 Family Trust
- Morveta Trust
- KAS 2011 Family Trust
- SASS 2010 Trust
- SASS 2013 Trust
- Mortimer DA Sackler Trust 1996

- Mortimer DA Sackler Trust 2002
- MDAS 2010 Family Trust
- MDAS 2011 Family Trust
- Theresa E. Sackler 1988 Trust
- There E. Sackler 2008 Trust
- TES Beacon 2012 Trust
- TES Beacon 2013 Trust
- TES Beacon 2014 Trust
- TES BARE Trust
- Perelle Bay Trust
- Racine Trust
- Millennium Trust
- Flat Creek Purpose Trust
- Mordas Consolidated Purpose Trust
- Trust Under Declaration of Trust No. 1 dated November 25, 1996
- Trust Under Declaration of Trust No. 2 dated November 25, 1996
- Ilene Sackler Lefcourt Revocable Trust
- JML Pour-Over Trust
- KLT Pour-Over Trust
- MDAS Investment Trust
- SS Tanager Trust
- Themar Consolidated Purpose Trust
- Trust under Agreement dated the 13th day of March 2009
- Trust Under Agreement made the 11th dat of May 2005
- MTS 2002 Trust
- MTS 2006 Trust
- SDS 2002 Trust
- SDS 2006 Trust
- MDS 2002 Trust
- MDS 2006 Trust

- The Trust U/A 11/5/74 fbo Beverly Sackler (the “74A Trust”)
- The Raymond R. Sackler Trust 1 dtd 12/23/89 (the “1A Trust”)
- The Raymond R. Sackler Trust 2 dtd 12/23/89 (the “2A Trust”)
- The Raymond R. Sackler Trust 1B Trust dtd 12/23/89 (the “1B Trust”)
- The Raymond R. Sackler Trust 2B dtd 12/23/89 (the “2B Trust”)
- The Trust B U/A/ 11/4/74 fbo Beverly Sackler (the “74B Trust”)
- The 1974 Irrevocable Investment Trust (the “Investment Trust”)
- The 1974 Irrevocable Trust fbo Beverly Sackler and Richard S. Sackler (the “74-AR Trust”)
- 1974 Irrevocable Trust fbo Beverly Sackler and Jonathan D. Sackler (the “74-AJ Trust”)
- AR Irrevocable Trust
- AJ Irrevocable Trust
- Beverly Sackler Trust 1 fbo David Alex Sackler 12/20/1989 (the “Gallo Trust 1”)
- Beverly Sackler Trust 2 fbo David Alex Sackler 12/20/1989 (the “Gallo Trust 2”)
- Beverly Sackler Trust 3 fbo David Alex Sackler 12/20/1989 (the “Gallo Trust 3”)
- Trust under agreement dated December 3, 1979 f/b/o Richard S. Sackler (“RSS BRP Trust”)
- Trust under agreement dated December 3, 1979 f/b/o Jonathan D. Sackler (“JDS BRP Trust”)
- Trust under agreement dated June 16, 1980 f/b/o Richard S. Sackler (“RSS FPC Trust”)
- Trust under agreement dated June 16, 1980 f/b/o Jonathan D. Sackler (“JDS FPC Trust”)
- Trust under agreement dated December 23, 1980 f/b/o Richard S. Sackler (“RSS XPC Trust”)
- Trust under agreement dated December 23, 1980 f/b/o Jonathan D. Sackler (“JDS XPC Trust”)
- Trust under agreement dated August 29, 2003 f/b/o Richard S. Sackler
- Trust under agreement dated August 29, 2003 f/b/o Jonathan D. Sackler
- Richard S. Sackler Life Insurance Trust
- Jonathan D. Sackler Life Insurance Trust
- Richard S. Sackler Trust f/b/o David A. Sackler March 8, 1990

- Trust under Declaration of Trust dated August 23, 1988 f/b/o Richard S. Sackler and Issue of Richard S. Sackler
- Trust under Declaration of Trust dated December 17, 1991 f/b/o Richard S. Sackler and issue of Richard S. Sackler
- Trust under Declaration of Trust dated August 23, 1988 f/b/o Jonathan D. Sackler and Issue of Jonathan D. Sackler
- Trust under Declaration of Trust dated December 17m 1991 f/b/o Jonathan D. Sackler and issue of Jonathan D. Sackler
- DABB Trust
- Richard S. Sackler Trust U/A 9/30/2004
- RSS Fiduciary Management Trust
- Crystal Trust
- MCM Fiduciary Management Trust
- Data Trust
- Cornice Trust
- Beverly Sackler Revocable Trust
- RSS Revocable Pourover Trust
- JDS Revocable Pourover Trust
- Irrevocable Trust under Declaration dated as of September 19, 1995 f/b/o Issue of Richard S. Sackler
- David A. Sackler 2012 Trust
- Irrevocable Trust under Declaration dated as of April 25, 1991
- Irrevocable Trust under Declaration dated as of August 25, 1992
- RSS 2012 Family Trust
- Raymond R. Sackler Credit Shelter Trust u/a 3/29/2012
- Raymond R. Sackler GST Exempt Marital Trust u/a 3/29/2012
- RSS CT Residence Trust 1
- RSS CT Residence Trust 2
- JDS CT Residence Trust 1
- JDS CT Residence Trust 2

- Beaver Pond 1
- Beaver Pond 2
- JML 2010 Family Trust
- KLT 2010 Family Trust
- Soft River Purpose Trust
- Fairfield Trust
- Gallo Trust 3 f/b/o Clare Elizabeth Sackler
- Gallo Trust 3 f/b/o Madeleine Sackler
- BRP Trust
- XPC Trust
- FPC Trust
- JDS Field Point Circle Trust (Residence parcel)
- JDS Field Point Circle Trust (Garage parcel)
- JDS North Bay Trust
- JDS Fiduciary Management Trust
- Gallo Trust 3 f/b/o Rebecca K. Sackler
- Gallo Trust 3 f/b/o Marianna R. Sackler
- Gallo Trust 3 f/b/o David A. Sackler
- RSS Field Point Circle Trust (Residence parcel)
- RSS Field Point Circle Trust (Garage parcel)
- RSS North Bay Trust
- RSS Fiduciary Management Trust
- October 31, 1974 Trust
- June 5, 1974 Settlement (Mortimer: “Maydean Trustee” or “ANZ One Limited,” Jersey, UK)
- Mordas or Jersey C.I. Trust No. 2, 12/16/76 Settlement between Mortimer David Sackler and Mordas Trust Limited
- Tahini Trust 06/07/82
- Das Chart (David A. Sackler) 12/20/89
- MRS Trust, December 21, 1989 (Marianna R. Sackler)

- RKS Trust, December 22, 1989 (Rebecca K. Sackler)
- RSS Trust, December 23, 1989 (Richard S. Sackler Family)
- JDS Trust, December 23, 1989 (Jonathan Sackler Family)
- MS Trust, December 26, 1989 (Madeleine Sackler)
- CES Trust, December 27, 1989 (Clare E. Sackler)
- MRCS Trust, December 30, 1989 (Miles R. C. Sackler)
- Hercules Trust, 06/08/93 Declaration of Trust by Hillside Limited
- Halm Trust 06/08/93 Declaration of Trust by Millborne Limited
- Trust by Mortimer D. Sackler & Ogier Trustee Limited 08/02/93 Settlement
- Betal Trust 12/01/93
- The Purdue Pharma Trust/Regio Trust, 12/31/93 Settlement
- Memphis Pharma Trust, 04/03/95
- December 17, 2001 Trust